

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

December 11, 2008

TO: Internal File

THRU: Priscilla Burton, Team Lead *PWB by SOS*

FROM: James D. Smith, Environmental Scientist III *JDS 12/15/08*

SUBJECT: Waste Rock Road Snow Removal Plan, Canyon Fuel Company, Skyline Mine, Permit # C/007/0005, Task ID # 3090

SUMMARY:

The Permittee has updated the plan for storing snow removed from the road to the Waste Rock Disposal Site. The amendment is a small-scale map on page 3-56(b), which replaces the outdated text description that is on that page in the current MRP.

TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Sediment Control Measures

The note on the map on page 3-56(b) states that runoff from snow melt will be treated using the sedimentation pond or other siltation structures. Whether the snow is left on the road or placed in the storage piles, runoff from the melting snow will report to the same sediment

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control structures and there will be no difference in the amount of runoff to be treated. Runoff intensity will typically be reduced because piling the snow will prolong melting.

Runoff from the uppermost storage area will report to the sedimentation pond. The other two storage areas lie along the access road, a Primary Mine Road. This road is ASCA # 24 in the Skyline MRP (Sec. 3.2.12), and the sediment control method listed for ASCAs include straw bales and silt fence: Plates 3.2.8-2 and 4.16.1-1D show the location of the silt fence at Swale SW 19. Outfalls of the swales are also rip-rapped to control erosion (p. 3-55).

Findings:

The proposed amendment meets the requirements of the Coal Mining Rules.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The Permittee has updated the plan for storing snow removed from the road to the Waste Rock Disposal Site. The amendment is a small-scale map titled the Waste Rock Snow Removal Plan. It is to be inserted as page 3-56(b). The map is as clear, if not clearer, than the existing, outdated text description of the snow storage sites that is on that page in the current MRP.

Findings:

The proposed amendment meets the requirements of the Coal Mining Rules.

RECOMMENDATIONS:

The proposed amendment should be approved for insertion into the MRP.